Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
Digital Television Distributed Transmission	)	
System Technologies	)	MB Docket No. 05-312
	)	

To: The Commission

COMMENTS OF READING BROADCASTING, INC.

Reading Broadcasting, Inc. ("RBI") hereby submits these comments in response to the Clarification Order and Notice of Proposed Rulemaking (the "NPRM") in the above-captioned proceeding, which was issued by the Federal Communications Commission (the "Commission" or the "FCC") on November 4, 2005. The NPRM seeks comment on a variety of issues relating to the deployment of DTS, including the FCC's proposed rules for future DTS operations and how DTS operation will serve the public interest and advance the overall DTV transition.

RBI is the licensee of WTVE(TV) and WTVE-DT, Reading, Pennsylvania, which are located in the Philadelphia, Pennsylvania designated market area ("DMA"). RBI has devoted substantial time and financial resources into the design of a DTS network for WTVE-DT, and enthusiastically supports the adoption of rules to authorize the use of DTS technology. RBI also is a member of the Coalition for DTS (the "Coalition"), which is filing comments separately in this proceeding.

I. DTS TECHNOLOGY WILL GENERATE SUBSTANTIAL PUBLIC INTEREST BENEFITS FOR CONSUMERS AND WILL FACILITATE THE RAPID DEPLOYMENT OF DTV SERVICE.

As the comments submitted in response to the Commission's *Second DTV Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television* (18 FCC Rcd 1279 (2003)) strongly indicated, approving the use of DTS technology will generate substantial public interest benefits. Through the strategic placement of the individual transmitters that make up a DTS network, DTS can overcome terrain and other obstructions and thereby facilitate over-the-air digital television service to populated areas with a station's service area that cannot be served by a traditional, single tower station. In addition, a station utilizing DTS can provide a stronger, more uniform broadcast signal throughout a DTV station's service area, including those locations at the periphery of the station's service area. The ability to deliver the DTV signal through multiple transmitters also makes possible improved in-home reception of DTV signals from set-top antennas because stronger signal levels will be available from multiple directions. Improving in-home reception of DTV signals is critical because it would facilitate the delivery of programming to the approximately 15% of U.S. households that do not subscribe to either cable or DBS service, as well as those households that do subscribe to one of these services but have one or more television receivers that still rely on over-the-air reception.

DTS also may accelerate and facilitate the DTV transition. DTS can serve as a less costly alternative to a large single tower facility as a means to build-out a maximized DTV service area. In many cases, small broadcasters cannot afford to purchase the costly high powered transmitter and other equipment necessary to build-out a maximized single

tower facility, and do not have the resources to construct, operate, maintain or rent a tall transmission tower in a central location. However, a DTS system offers the possibility of a less costly alternative because it will use lower powered transmitters and antennas that can be located on smaller, existing towers, with correspondingly shorter, and less expensive, transmission lines. The reduced capital costs for equipment, combined with lower tower and electrical costs, will advance the DTV transition by allowing more stations, including those owned by small broadcasters, to build out or expand their DTV service areas.

DTS may accelerate the DTV transition in other ways as well. Stations whose single tower proposals have been blocked or delayed as a result of local restrictions on tower height and placement may be able to roll out their digital facilities more expeditiously by constructing shorter towers, or using shorter, existing towers that currently support other communications services, such as cellular and PCS.

DTS also will permit the more efficient use of the broadcast spectrum. By deploying a network of transmitters, no single transmitter in a DTS system will typically serve a very large area. Therefore, each transmitter within a station's DTS network will generally operate at a power level that is significantly lower than required for a maximized single transmitter station. Despite these lower operating powers, a station utilizing DTS can achieve equal or improved service levels and improved in-home reception while at the same time reducing overall interference to nearby stations.

II. THE FCC SHOULD AFFORD DTS FACILITIES PRIMARY REGULATORY STATUS.

RBI fully supports the Commission's conclusion that the multiple transmitters used in DTS should be afforded primary regulatory status. As the Commission has

already recognized, granting DTS primary status is necessary to protect the increased and expanded service benefits that DTS can provide. Indeed, there would be little or no incentive to deploy a DTS network if by doing so a station would lose interference protection to any portion of its service area. Moreover, treating DTS transmitters on a secondary basis would have the unwanted effect of discouraging efforts to enhance service to the public. For this reason, RBI also supports the FCC's proposal to license DTS transmitters under Part 73.

III. THE FCC SHOULD NOT HAMSTRING THE POTENTIAL BENEFITS OF DTS BY LIMITING THE DTS SERVICE AREA TO THE EQUIVALENT OF THE AREA A SINGLE TRANSMITTER STATION COULD SERVE.

The Commission has tentatively proposed to limit the area that a station can serve from its DTS operation to the equivalent of the area that it could serve using a single transmitter. RBI respectfully submits that this proposal imposes unnecessary and outdated limitations on DTV service that are based on technological limitations associated with analog television that are inapplicable to DTS. Specifically, multiple analog transmitters cannot operate on the same channel because the combined signals would generate fatal, self-inflicted interference. This technological limitation effectively constrains analog broadcasters to providing service only to the area served by the single transmitter. However, DTV receivers are not subject to this technological limitation because they have built-in adaptive equalizers that will select the strongest received signal from the multiple DTS transmitters operating on the same frequency. The Commission should not hamstring the potential benefits of DTS by unnecessarily constraining digital television service on the basis of the limitations of analog technology.

RBI urges the Commission to allow stations utilizing DTS to provide service throughout their DMA at the end of the DTV transition. Small broadcasters generally operate stations in outlying communities that often are unable to serve the more densely populated portions of their markets due to distance or terrain obstructions. Although these stations clearly are part of their FCC-defined market, and must compete with those stations that are more centrally located, they are unable to do so effectively due to the inherent geographic limitations of their allotment. Permitting stations that utilize DTS to provide service within their entire FCC-defined market will level the competitive playing field.

Permitting service expansion in this fashion will generate other public interest benefits as well. As noted above, approximately 15% of all U.S. households do not subscribe to an MVPD service. Allowing stations using DTS to provide service within their assigned DMA will advance the public interest by providing these viewers with increased access to over-air-broadcast service and a wider variety of programming options. Moreover, expanding the service area for stations using DTS would enable broadcasters to provide to consumers an alternative source of multichannel video programming.

RBI respectfully disagrees with the Commission's rationale for tentatively rejecting the DMA-wide service expansion proposal for DTS. First, expansion of the DTS service area in this fashion is not inconsistent with the Commission's traditional focus on localism. Stations deploying DTS are and will remain subject to the existing, long-standing requirement to serve the needs and interests of their community of license, and that requirement can continue to be enforced against stations using DTS to serve their

DMA during the license renewal process. Moreover, the Commission ignores the fact that the programming delivered by most television stations already is carried by cable and/or DBS in areas well outside their communities of license. The instant proposal merely allows broadcast television to serve as an effective, subscription-free video distribution outlet for consumers and to compete on a more level playing field with cable and DBS.

The Commission also speculates that an expansion of the service area for stations deploying DTS would preclude new stations from entering the market. This concern is misplaced. The impact of service expansion using DTS will be severely limited due to the fact that it will occur on the same channel that the DTS station already occupies. As a consequence, in most instances, new entrants would not be permitted to commence operations on those channels due to the potential for co-channel interference.

With respect to the Commission's legitimate desire to prevent "cherry-picking," RBI believes that the signal strength and coverage limits proposed by the Coalition will prevent a station using DTS to abandon viewers already receiving service.

CONCLUSION

For the reasons set forth herein and in the comments of the Coalition, RBI respectfully urges the Commission to expeditiously adopt rules authorizing the use of DTS technology and permit stations using DTS to provide service within their entire DMA.

Respectfully submitted,

READING BROADCASTING, INC.

By: s/George L. Miller_____
Chapter 11 Trustee
Reading Broadcasting, Inc.
1628 John F. Kennedy Blvd
Suite 950
Philadelphia, PA 19103
(215) 561-0950